

Message

From: Ex. 6 Personal Privacy (PP)
Sent: 10/8/2019 4:05:15 PM
To: Topinka, Natalie [topinka.natalie@epa.gov]
Subject: Re: Question

Natalie, We did no air permitting for CHK. There was a significant difference in the application of the permitting rule, so CHK did all their own air permitting in-house.

Sent from my iPhone

On Sep 26, 2019, at 12:44 PM, Topinka, Natalie <topinka.natalie@epa.gov> wrote:

Complete OGI/FLIR videos are not required to be kept for demonstrating compliance with NSPS OOOOa, at 40 CFR 60.5397a (I assume you meant OOOOa, as NSPS Subpart OOOO does not have OGI options or requirements). However, in addition to the written log/records of fugitive emissions surveys performed and results, see this provision of NSPS OOOOa, at 40 CFR 60.5420a(c)(15)(ii)(E), which requires at least a minimum of a frame of the video showing time/date/location of the survey.

(E) When optical gas imaging is used to perform the survey, one or more digital photographs or videos, captured from the optical gas imaging instrument used for conduct of monitoring, of each required monitoring survey being performed. The digital photograph must include the date the photograph was taken and the latitude and longitude of the collection of fugitive emissions components at a well site or collection of fugitive emissions components at a compressor station imbedded within or stored with the digital file. As an alternative to imbedded latitude and longitude within the digital file, the digital photograph or video may consist of an image of the monitoring survey being performed with a separately operating GPS device within the same digital picture or video, provided the latitude and longitude output of the GPS unit can be clearly read in the digital image.

Individual state rules or permits may have additional requirements.

Natalie M. Topinka
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U.S. Environmental Protection Agency, Region 5
Air Enforcement and Compliance Assurance Branch
77 West Jackson Boulevard (ECA-18J)
Chicago, IL 60604
ph: (312) 886-3853

From: Ex. 6 Personal Privacy (PP)
Sent: Thursday, September 26, 2019 12:20 PM
To: Topinka, Natalie <topinka.natalie@epa.gov>
Subject: Question

Are recorded OGI FLIR videos required for NSPS OOOO compliance, or only a written ledger illustrating leakers and nonleaker?

Sent from my iPhone

On Sep 26, 2019, at 9:44 AM, Topinka, Natalie <topinka.natalie@epa.gov> wrote:

I can view the video. I will be available at 10:30 Central time – feel free to give me a call then.

Natalie M. Topinka
Environmental Scientist
U.S. Environmental Protection Agency, Region 5
Air Enforcement and Compliance Assurance Branch
77 West Jackson Boulevard (ECA-18J)
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From: Ex. 6 Personal Privacy (PP)
Sent: Thursday, September 26, 2019 9:41 AM
To: Topinka, Natalie <topinka.natalie@epa.gov>
Subject: OGI video of tanks

Let me know if you can view this video and I will call to explain.